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IN THE UNITED STATES DISTRICT COURT
DISTRICT OF UTAH

UNITED STATES OF AMERICA, Plaintiff, v. JAMES WOLFGRAMM, a.k.a. SEMISI NIU, Defendant.	Case No. 2:22-CR-0002-HCN STIPULATED MOTION FOR PROTECTIVE ORDER Judge Howard C. Nielson Magistrate Judge Cecilia M. Romero
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The United States of America, by and through Assistant United States Attorney, Aaron B. Clark, hereby requests the Court enter the following protective order in this case:

1. On January 6, 2022, the United States filed an Information against the Defendant, alleging four counts of violating 18 U.S.C. § 1343 – Wire Fraud.

2. In the course of the United States' investigation, the United States has created and obtained documents – reports and other records – containing personal identifying information of victims and other witnesses. The United States intends to continue to investigate and obtain additional documents, reports, and records that will likely contain such information.

3. The United States intends to produce the above materials in discovery to the defense. All such materials are intended solely for the use of the Defendant, his attorney, or other individuals or entities acting within the attorney-client relationship to prepare for the trial in this case. The purpose of this protective order is to prevent the unauthorized dissemination, distribution, or use of such materials containing the personal or confidential information of others or gathered in connection with an on-going criminal investigation.

4. Defendant, his attorneys, and all other individuals or entities who receive materials in this case should be prohibited from directly or indirectly providing access to, or otherwise disclosing the contents of, these materials to anyone not working on the defense of this criminal case, or otherwise making use of the materials in a manner unrelated to the defense of this criminal case. Authorized use of materials related to the defense of this criminal case shall include showing and discussing such materials with United States and defense witnesses.

5. Defendant, his attorneys, and all other individuals or entities who receive materials in this case should maintain all materials received from the United States in a manner consistent with the terms of this protective order. Materials produced to the defense shall be stored in a secure manner by defense counsel in boxes, files, or folders marked "UNDER PROTECTIVE ORDER -

DO NOT DISCLOSE.” Electronic materials produced to the defense and printouts obtained from electronic materials shall be handled in the same manner.

7. Defendant and his attorneys are required to give a copy of this protective order to all individuals or entities engaged or consulted by defense counsel in preparation of the trial in this case. A knowing and willful violation of this protective order by the Defendant, her attorney, or others may result in contempt of court proceedings or other civil or criminal sanctions.

8. Within 90 days of the conclusion of this case, including all related appeals, all documents produced pursuant to this protective order, and all copies thereof (other than exhibits of the Court), shall be returned to the United States Attorney’s Office. Alternatively, the Defendant’s attorney may inform the United States Attorney’s Office in writing that all such copies have been destroyed.

9. The provisions of this order governing disclosure and use of the documents shall not terminate at the conclusion of this criminal prosecution.

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10. Defense counsel was provided a copy of the proposed protective order and does not object.

Respectfully submitted on January 28, 2022.

ANDREA T. MARTINEZ
United States Attorney

/s/ Aaron B. Clark
AARON B. CLARK
Assistant United States Attorney